

# WISCONSIN LEGISLATIVE COUNCIL STAFF

## RULES CLEARINGHOUSE

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## CLEARINGHOUSE RULE 95-222

### Comments

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated October 1994.]**

### 2. Form, Style and Placement in Administrative Code

a. The “relating to” clause states that the rule relates to “administration of grants.” Since the department administers a number of grants, a more descriptive phrase is needed to inform readers to which grants the rule pertains.

b. The subchapter title should be written in all capital letters. [See s. 1.05 (2) (a), Manual.] In addition, while the analysis of the rule appears to identify the grant program contained in the rule as the Heritage State Park and Forest Trust Grants, the rule refers to the grant program as the Friends Group Grants for State Operations and Maintenance. Perhaps the analysis of the rule could better explain the difference in the names attached to the grant program.

Also, the analysis should be more descriptive. The analysis in the Report to the Legislative Council Rules Clearinghouse could be substituted for the analysis in the rule.

c. The title to s. NR 51.91 refers to “definitions.” There do not appear to be any definitions contained in the section. Accordingly, it appears that “APPLICABILITY.” would suffice.

d. A note should be added to s. NR 51.92 identifying where the comprehensive list of potential projects may be obtained.

e. In s. NR 51.93 (intro.), “do any of the following” should precede the colon.

f. The text of the rule should be followed by an effective date clause. [See s. 1.02 (4), Manual.]

**4. Adequacy of References to Related Statutes, Rules and Forms**

It appears that the subchapter title's reference to s. 23.098, Stats., should be a reference to s. 27.016, Stats.

**5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. Section NR 51.91 is unclear. It appears that s. 27.016, Stats., provides that only friends groups are eligible for grants. Could s. NR 51.91 be rewritten simply to provide that the subchapter applies to friends groups defined in s. 23.098 (1), Stats.?

b. The phrase "It is" at the beginning of the second sentence in s. NR 51.91 should be replaced by the phrase "This subchapter" in order to clarify the section. Also, "nonstock" should replace "non stock."

c. In s. NR 51.94 (5), the second sentence appears to authorize a grant applicant to receive 100% of the grant funds available. Perhaps this sentence should be clarified to provide that an applicant may receive 100% of the grant funds for which it has been approved.